

STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: PEOPLES GAS LIGHT AND COKE CO.	Operator ID#: 15329
Inspection Date(s): 5/13/2014, 5/14/2014, 5/15/2014, 5/27/2014, 5/28/2014	Man Days: 9
Inspection Unit: G.O. Transmission, G.O.	
Location of Audit: Chicago	
Exit Meeting Contact: Glannie Chan	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Aaron McElravy, Steve Canestrini	
Company Representative to Receive Report: Tom Webb	
Company Representative's Email Address: TJWebb@peoplesgasdelivery.com	

Headquarters Address Information:	130 E. Randolph Street Chicago, IL 60601 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Jodi Caro Phone#: (000) 000-0000 Email:	Willard Evans Phone#: (000) 000-0000 Email:
Inspection Contact(s)	Title	Phone No.
Fabian Beltran	Associate Engineer	
Carol Schafer	Manager Business Support	
Richard Mosar	Supervisor GIS	
Ray Deatherage	Manager Technical Training and Quality Assurance	
Kamara Smith	Engineer	
Robert Mirabal	Supervisory Engineer	
Deborah Hozzian	Supervisory Operations Specialist	
Matthew Krecun	Sr. Customer Communication Specialist	
Adam Wandycz	Senior Engineer	
Harsh Mehta	Associate Engineer	
Eddie Morrow	Senior Engineer Compliance	(312) 240-4360

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Juan Santiago	Manager Gas Distribution Design	
Glannie Chan	Supervisor Gas Compliance	(312) 240-3888
Mark Lempicki	Supervisory Engineer	

Gas System Operations	Status
Gas Transporter	Various
Miles of Main	419.7
Confirm Operator's Potential Impact Radius Calculations	Various

General Comment:

Staff met with PGL to confirm the calculations for determining the Potential Impact Radius "(PIR)". Staff was provided the calculations and Risk Reassessment detailing the segments which were determined adequate. The list provided all transmission pipelines and the associated PIR.

Annual Report (Form 7100.2.1) reviewed for the year:	Not Checked
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General Comment:

Staff previously reviewed the Annual Report for calendar year 2013.

Regulatory Reporting Records	Status
<u>Category Comment:</u> Peoples did not encounter incidents or accidents in 2013.	

[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
[191.15(a)]	Was a DOT Incident Report Form F7100.2 submitted within 30 days after detection of an incident?	Not Applicable
[191.15(b)]	Were there any supplemental incident reports when deemed necessary?	Not Applicable
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
[192.16(c)]	Customer Notification: Has the operator notified each customer after the customer first receives gas at a particular location?	Satisfactory

General Comment:

Staff met with PGL to verify customers were receiving notification regarding the customer's responsibility for buried piping. PGL maintains a list of each customer who has received the notice within 90 days of service. The information is included in the 1st bill and documentation of mailing is maintained for validation. The information is also received through a Safety Packet provided by the field employee when service is activated, annual mailing and the customer connection pamphlet detailing web site access.

DRUG TESTING	Status
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Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>Staff will conduct a Drug and Alcohol inspection at a later date.</i>		
TEST REQUIREMENTS		Status
<u>Category Comment:</u> <i>Staff reviewed pressure testing conducted in 2013.</i>		
[192.517(a)][192.505,192.507,192.509,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
UPRATING		Status
<u>Category Comment:</u> <i>Peoples did not conduct uprating activities in 2013.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Not Checked
<u>General Comment:</u> <i>The records associated with the operations and maintenance manual were inspected during the Tech Training audit in January 2014.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
<u>General Comment:</u> <i>The records associated with the operations and maintenance manual were inspected during the Tech Training audit in January 2014.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u> <i>All employees have access to the appropriate records through Navigate.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Not Checked
<u>General Comment:</u>		

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<i>The records associated with the operations and maintenance manual were inspected during the Tech Training audit in January 2014.</i>		
[192.603(b)][192.605(c)(1)(i)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of unintended closure of valves or shutdowns?	Not Checked
<u>General Comment:</u> <i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
[192.603(b)][192.605(c)(1)(ii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside normal operating limits?	Not Checked
<u>General Comment:</u> <i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
[192.603(b)][192.605(c)(1)(iii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of loss of communications?	Not Checked
<u>General Comment:</u> <i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
[192.603(b)][192.605(c)(1)(iv)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of operation of any safety device?	Not Checked
<u>General Comment:</u> <i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
[192.603(b)][192.605(c)(1)(v)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property?	Not Checked
<u>General Comment:</u> <i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
[192.603(b)][192.605(c)(2)]	Does the operator maintain documentation of checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?	Not Checked
<u>General Comment:</u> <i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
[192.603(b)][192.605(c)(3)]	Does the operator maintain documentation of notifying responsible operator personnel when notice of an abnormal operation is received?	Not Checked

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<u>General Comment:</u>		
<i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
[192.603(b)][192.605(c)(4)]	Does the operator maintain documentation for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found?	Satisfactory
[192.603(b)][192.619,192.621,192.623]	Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Not Checked
<u>General Comment:</u>		
<i>PGL is in the process of verifying the MAOP for transmission pipelines.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
[192.709(c)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Not Checked
<u>General Comment:</u>		
<i>The continuing surveillance records were inspected during the Division St. records audit conducted in January 2014.</i>		
CLASS LOCATION CHANGE		Status
[192.709(c)][192.609]	Does the operator maintain documentation when the class location changes for a segment of pipe operating at a hoop stress that is more than 40% SMYS?	Not Applicable
<u>General Comment:</u>		
<i>No class location changes occurred in 2013.</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
Refer to operator Qualification Inspection Forms and Protocols		Not Checked
<u>General Comment:</u>		
<i>Records associated with the Qualification of Personnel were inspected during the Tech Training record audit conducted in January 2014.</i>		
DAMAGE PREVENTION RECORDS		Status
<u>Category Comment:</u>		
<i>Damage Prevention records were inspected during the Division St. record audit conducted in January 2014.</i>		
[192.709(c)][191.17(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[192.709(c)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are	Not Checked

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	addressed to minimize the recurrence?	
[192.709(c)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Applicable
<u>General Comment:</u> <i>This portion of Peoples gas system is not under JULIE Enforcement.</i>		
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Not Checked
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Checked
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>All operating personnel have access to the emergency plan on their computer and office location.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Not Checked
<u>General Comment:</u> <i>The records were inspected during the Tech Training record audit conducted in January 2014.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Not Checked
<u>General Comment:</u> <i>The records associated with employee activity reviews were conducted during Division St. audit conducted in January 2014.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Not Checked
<u>General Comment:</u> <i>The records were inspected during the Tech Training record audit conducted in January 2014.</i>		

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[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Not Checked
<u>General Comment:</u> <i>The records were inspected during the Division St. record audit in January 2014.</i>		
[192.603(b)][192.615(a)(11)]	Has the operator maintained documentation of actions that were required to be taken by a controller during and emergency?	Not Checked
<u>General Comment:</u> <i>These records are inspected during the control room audit to determine adequate response to abnormal operating conditions.</i>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status
<u>Category Comment:</u> <i>Staff did not conduct a Public Awareness audit in conjunction with this inspection an audit will be completed at a later date.</i>		
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
ODORIZATION OF GAS		Status
[192.709(c)][192.625(f)]	Where required, has the operator maintained documentation of odorant concentration level testing?	Not Checked
<u>General Comment:</u> <i>Staff inspected odorant concentration levels during the Division St. record audit conducted in January 2014.</i>		
[192.709(c)][192.625(e)]	Where required, has the operator maintained documentation of odorizer tank levels?	Satisfactory
PATROLLING & LEAKAGE SURVEY		Status
<u>Category Comment:</u> <i>The records associated with Patrolling and Leakage survey were inspected during the Division St. audit conducted in January 2014.</i>		
[192.709(c)][192.705]	Does the operator maintain documentation of a patrol program as required?	Not Checked
[192.709(c)][192.706]	Does the operator maintain documentation of leakage survey(s) performed on a transmission pipeline?	Not Checked
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Not Applicable
<u>General Comment:</u>		

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<i>People's gas did not abandon transmission pipelines in 2013.</i>		
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Applicable
<u>General Comment:</u> <i>People's gas did not abandon transmission pipelines in 2013.</i>		
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Not Applicable
<u>General Comment:</u> <i>People's gas did not abandon transmission pipelines in 2013.</i>		
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
<u>General Comment:</u> <i>People's gas did not abandon transmission pipelines in 2013.</i>		
COMPRESSOR STATION		Status
<u>Category Comment:</u> <i>The operator's system inside the City of Chicago does not contain compressor stations.</i>		
[192.709(c)][192.731(a)]	Has the operator maintained documentation of the compressor station relief devices at a minimum of 1 per year/15 months?	Not Applicable
[192.709(c)][192.731(c)]	Has the operator maintained documentation compressor station emergency shutdown at a minimum of 1 per year/15 months?	Not Applicable
[192.709(c)][192.736(c)]	Has the operator maintained documentation of the compressor stations – detection and alarms?	Not Applicable
PRESSURE LIMITING AND REGULATION		Status
[192.709(c)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Not Checked
<u>General Comment:</u> <i>Staff inspected the pressure limiting and regulating station inspections during the Tech Training audit conducted in January 2014.</i>		
[192.709(c)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Not Applicable

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<u>General Comment:</u>		
People's gas utilizes a control monitor for overpressure protection requirements.		
[192.709(c)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u>		
People's gas utilizes a control monitor for overpressure protection requirements.		
[192.709(c)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Yes
[192.709(c)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Satisfactory
VALVE MAINTENANCE		Status
<u>Category Comment:</u>		
The records associated with Valve and Vault inspections were inspected during the Division St. audit conducted in January 2014.		
[192.709(c)][192.745(a),192.745(b)]	Did the operator inspect and partially operate transmission valves that might be required during any emergency at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.749]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Checked
Investigation Of Failures		Status
[192.709(c)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Checked
<u>General Comment:</u>		
The records associated with failure analysis were inspected during the Tech Training audit conducted in January 2014.		
WELDING OF STEEL PIPE		Status
<u>Category Comment:</u>		
The Welding records were inspected during the Tech Training audit conducted in January 2014.		
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Not Checked
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification documentation as required?	Not Checked
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked

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CORROSION CONTROL RECORDS		Status
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system	Not Checked
General Comment: <i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.459]	Has the operator maintained documentation of examination when buried pipe was exposed?	Satisfactory
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Not Checked
General Comment: <i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Not Checked
General Comment: <i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Checked
General Comment: <i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Checked
General Comment: <i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Applicable
General Comment: <i>The operator's transmission system does not contain unprotected pipelines</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation including casings?	Not Checked

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<u>General Comment:</u>		
<i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Not Checked
<u>General Comment:</u>		
<i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Checked
<u>General Comment:</u>		
<i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Not Checked
<u>General Comment:</u>		
<i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
<u>General Comment:</u>		
<i>The operator does not transport corrosive gas in this portion of the system.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
[192.491]	Has the operator maintained documentation of written procedures supported by as-built drawings or other construction records?	Satisfactory
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
<u>General Comment:</u>		
<i>The operator does not transport corrosive gas in this portion of the system.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Not Checked
<u>General Comment:</u>		
<i>The records were inspected during the Division St. audit conducted in January 2014.</i>		

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[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Not Checked
<u>General Comment:</u> <i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Checked
<u>General Comment:</u> <i>The records were inspected during the Division St. audit conducted in January 2014.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
<u>Category Comment:</u> <i>The training records were inspected during the Tech Training audit conducted in January 2014.</i>		
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u> <i>People's gas is not a master meter.</i>		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Not Checked

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